

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
EASTERN DIVISION**

**JASON BUSE and  
DUSTIN STALLINGS,**

**Plaintiffs,**

**v.**

**Civil Action Number:  
1:19-cv-00287-ACA**

**ERMEALD COAST RV CENTER  
d/b/a CAMPING WORLD RV  
SALES and FREEDOM  
ROADS, LLC,**

**Defendants.**

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**MOTION TO WITHDRAW**

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COMES NOW counsel for the Plaintiffs, Kirby D. Farris and Meredith M. Maitrejean, and respectfully request this Court grant their Motion to Withdraw. As grounds therefore, the undersigned states as follows:

1. Counsel for Plaintiffs, Kirby D. Farris and Meredith M. Maitrejean, were retained to represent Plaintiffs Jason Buse and Dustin Stallings for unpaid wages and/or overtime under the Federal Labor Standards Act.
2. Counsel has had great difficulty communicating with Mr. Stallings and Mr. Buse. As such, this matter has been unable to move forward.

3. On or about August 19, 2019, undersigned Counsel hand delivered a letter detailing their several unsuccessful attempts to reach Mr. Buse and Mr. Stallings and requesting immediate communication (EXHIBIT A). However, the undersigned was unable to connect with either Mr. Buse or Mr. Stallings.

4. On or about December 17, 2019, undersigned Counsel had notice hand delivered to Plaintiffs advising their intent to file a Motion to Withdraw as counsel for Plaintiffs within ten (10) days (EXHIBIT B).

5. To date, undersigned Counsel has been unable contact Plaintiffs.

6. As Mr. Buse and Mr. Stallings are no longer cooperating with counsel and have become uncommunicative despite Counsel's best efforts to work with each, undersigned counsel respectfully requests this Honorable Court allow them to withdraw as counsel for Plaintiffs.

7. This matter is currently stayed pending arbitration, so Plaintiffs would not be prejudiced by undersigned counsel's withdrawal.

8. Future notice to Jason Buse is to be made at the following address: 3312 Miller Lane Anniston, Alabama 36207.

9. Future notice to Dustin Stallings is to be made at the following address: 3312 Miller Lane Anniston, Alabama 36207.

10. Pursuant to this Honorable Court's Initial Order, undersigned counsel has served a copy of this Motion on Mr. Buse and Mr. Stallings and has informed each of the right to promptly file an objection with the court.

Respectfully submitted on this the 13<sup>th</sup> day of January, 2020.

/s/ Kirby D. Farris

KIRBY D. FARRIS

ASB-2224-R78K

Attorney for Plaintiffs

/s/ Meredith M. Maitrejean

MEREDITH M. MAITREJEAN

ASB-1264-H63N

Attorney for Plaintiffs

**OF COUNSEL:**

**Farris, Riley & Pitt, L.L.P.**

The Financial Center

505 20<sup>th</sup> Street North

Suite 1700

Birmingham, AL 35203

Telephone: (205) 324-1212

Facsimile: (205) 324-1255

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13<sup>th</sup> day of January, 2020, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and/or U.S. Regular and Certified Mail, which will send notification of such to the following:

Courtney C. Morman, Esq.  
Jennifer F. Swain, Esq.  
LITTLER MENDELSON, PC  
420 30<sup>th</sup> Street North  
Suite 2300  
Birmingham, Alabama 35203

Jason Buse  
3312 Miller Lane  
Anniston, Alabama 36207

Dustin Stallings  
3312 Miller Lane  
Anniston, Alabama 36207

/s/ Kirby D. Farris  
OF COUNSEL

# **EXHIBIT A**



**FARRIS, RILEY & PITT LLP**  
PERSONAL INJURY ATTORNEYS

Kirby Farris  
Ken Riley  
JD Lawrence

♦ ♦ ♦  
Anastasia Allmon\*\*  
Brett Hollett  
Meredith Maitrejean  
Calle Mendenhall  
Jessica Zorn\*

Redding Pitt  
1944-2016

♦ ♦ ♦

\*Also licensed in GA  
\*\*Also licensed in GA and MS

August 18, 2019

**Via Hand Delivery**

Jason Todd Buse  
119 County Lane  
Eastaboga, AL 36260

**RE:            *Jason Buse and Dustin Stallings v. Emerald Coast RV Center  
d/b/a Camping World RV Sales and Freedom Roads, LLC  
United States District Court for the Northern District of  
Alabama, Eastern Division  
Case Number: 1:19-cv-00278-ACA***

Dear Mr. Buse:

I have attempted to contact you several times regarding your case with our office. It is very important that we keep communication open throughout your case. I cannot effectively represent you, if we do not communicate. As such, if I do not hear from you by September 3, 2019, myself and Kirby Farris will have no choice but to withdraw from representing you. I look forward to hearing from you.

Very truly yours,

Meredith K. Maitrejean  
Attorney at Law



**FARRIS, RILEY & PITT LLP**  
PERSONAL INJURY ATTORNEYS

Kirby Farris  
Ken Riley  
JD Lawrence

♦ ♦ ♦  
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August 18, 2019

**Via Hand Delivery**

Jason Todd Buse  
119 County Lane  
Eastaboga, AL 36260

**RE:        *Jason Buse and Dustin Stallings v. Emerald Coast RV Center  
d/b/a Camping World RV Sales and Freedom Roads, LLC  
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Dear Mr. Buse:

I have attempted to contact you several times regarding your case with our office. It is very important that we keep communication open throughout your case. I cannot effectively represent you, if we do not communicate. As such, if I do not hear from you by September 3, 2019, myself and Kirby Farris will have no choice but to withdraw from representing you. I look forward to hearing from you.

Very truly yours,

Meredith K. Maitrejean  
Attorney at Law

# **EXHIBIT B**





**FARRIS, RILEY & PITT LLP**  
PERSONAL INJURY ATTORNEYS

Kirby Farris  
Ken Riley  
JD Lawrence  
♦ ♦ ♦  
Anastasia Allmon\*\*  
Brett Hollett  
Meredith Maitrejean  
Calle Mendenhall  
Jessica Zorn\*

Redding Pitt  
1944-2016

♦ ♦ ♦

\*Also licensed in GA  
\*\*Also licensed in GA and MS

January 13, 2020

**Via Hand Delivery**

Jason Todd Buse  
3312 Miller Lane  
Anniston, AL 36207

*RE: Buse v. Camping World, et al.*

Dear Mr. Buse:

In accordance with my earlier letters, I will be filing the enclosed Motion to Withdraw. Please note that you have a right to file a timely objection to this Motion. I am sorry we could not work out our differences and thank you for considering our firm.

Very truly yours,

**/s/ Kirby D. Farris**

Kirby D. Farris  
Attorney at Law



**FARRIS, RILEY & PITT LLP**  
PERSONAL INJURY ATTORNEYS

Kirby Farris  
Ken Riley  
JD Lawrence  
♦ ♦ ♦  
Anastasia Allmon\*\*  
Brett Hollett  
Meredith Maitrejean  
Calle Mendenhall  
Jessica Zorn\*

Redding Pitt  
1944-2016

♦ ♦ ♦

\*Also licensed in GA  
\*\*Also licensed in GA and MS

December 17, 2019

**Via Hand Delivery**

Dustin Stallings  
3312 Miller Lane  
Anniston, AL 36207

*RE: Buse v. Camping World, et al.*

Dear Mr. Stallings:

In accordance with my earlier letters, I will be filing the enclosed Motion to Withdraw. Please note that you have a right to file a timely objection to this Motion. I am sorry we could not work out our differences and thank you for considering our firm.

Very truly yours,

**/s/ Kirby D. Farris**

Kirby D. Farris  
Attorney at Law